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MEMO ENDORSED

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July 31, 2025

Hon. Andrew L. Carter Jr.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 435  
New York, New York 10007

Re: *Espinales v. Proper Hospitality Solutions, LLC et al.*  
Case No. 1:24-cv-08599-ALC  
First Extension Request

Dear Judge Carter:

We are counsel to Defendant Proper Hospitality Solutions, LLC (“PHS”) in the above captioned case. We write on behalf of all parties to respectfully request an extension of time to file the proposed settlement and joint memorandum of law, as directed by the Court’s June 24, 2025 Order (D.E. 21). This is the first such request for an extension of this deadline by any party.

The parties notified the Court of the settlement in principle on June 23, 2025 (D.E. 20). The Court directed the parties to submit a proposed settlement and joint memorandum of law on or before July 31, 2025.

The parties respectfully propose a thirty-day extension from the date of this request, with the parties’ proposed settlement to be filed on or before August 30, 2025. All parties consent to this request.

Thank you for Your Honor’s time and consideration.

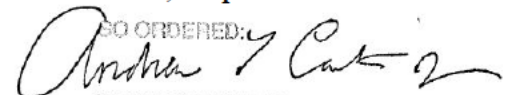
Respectfully submitted,

/s/ Helen A. Rella

Helen A. Rella, Esq.

cc: All counsel of record (by ECF)  
Chambers (courtesy copy via email)

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SO ORDERED:  


HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE  
July 31, 2025  
New York, NY

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